

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF PENNSYLVANIA**

INSULATE SB, INC., a California Corporation, individually and on behalf of all others similarly situated,

Plaintiff,

v.

ABRASIVE PRODUCTS & EQUIPMENT, et al.,

Defendants.

Civil Action No. 1:13-cv-01609-YK  
(Chief Judge Yvette Kane)

Filed Electronically

**ORAL ARGUMENT REQUESTED**

**PLAINTIFF'S MOTION FOR EXPEDITED DISCOVERY AND  
MOTION TO SHORTEN TIME**

Plaintiff Insulate SB, Inc., through its undersigned counsel, hereby moves this Court for an Order granting Plaintiff's Motion for Expedited Discovery and Motion to Shorten Time.

This motion is made pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure, and on the grounds that expedited discovery is required against Defendants to aid Plaintiff in supporting (1) its concurrently filed motion for preliminary injunction; and (2) its impending motion for class certification.

Because Defendants' unlawful and anticompetitive conduct is ongoing, Plaintiff must move expeditiously for a preliminary injunction to prevent further irreparable harm. Accordingly, Plaintiff also respectfully requests that the Court shorten the time for Defendants to respond to this Motion and schedule an

expedited hearing, so that Plaintiff may promptly submit its brief and evidence in support of the Motion for Preliminary Injunction.

Given the urgency articulated herein, counsel for Plaintiff is unable to seek the agreement of Defendants regarding the relief requested.

The grounds for this motion are set forth in the following memorandum of law, all pleadings and records on file, and any additional briefing and argument presented to the Court.

Respectfully submitted,

s/ Christopher A. Nedeau

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s/ Lawrence H. Pockers

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*Counsel for Plaintiff Insulate SB, Inc.*

June 19, 2013

## **PROOF OF SERVICE**

I certify that I served a copy of the foregoing Plaintiff's Motion for Expedited Discovery and Motion to Shorten Time on the following parties by certified mail:

Abrasive Products & Equipment  
c/o National Registered Agents, Inc.  
350 N. St. Paul Street  
Suite 2900  
Dallas, TX 75201-4234

Advanced Finishing Systems, Inc.  
*Attn:* Steven Edmondson  
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Air Power, Inc.  
*Attn:* William A. Ball  
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High Point, NC 27260

Airtech Spray Systems  
*Attn:* Joe A. Acosta  
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Houston, TX 77018

Barnhardt Manufacturing Company  
*Attn:* Thomas L Barnhardt  
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C.H. Reed, Inc.  
301 Poplar Street  
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C.J. Spray Inc.  
6270 Claude Way E  
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Carolina Equipment & Supply Co. Inc. (CESCO Inc.)

*Attn:* E. Larry Fulmer  
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North Charleston, SC 29418

Clemtex, Inc.

*Attn:* David E. Groves  
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Coast Industrial Systems, Inc.

*Attn:* Larry L. Onstott, Jr.  
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Coatings Holdings, Ltd.  
*Attn:* Jed L. Stellmacher  
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Corrosion Specialties, Inc.  
*Attn:* John M. Steinmann  
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Demilec (USA) LLC  
*Attn:* James C. Ash, Jr.  
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Dove Equipment Co., Inc.  
*Attn:* Francisco Javier Salazar  
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Endisys Fluid Delivery Systems  
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F&S Equipment and Supplies, Inc.

*Attn:* Albert Gerald McVay  
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Birmingham, AL 35201

Golden State Paint Corporation

*Attn:* Albert Damon Kovacs  
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Graco, Inc.

c/o Corporation Service Company  
380 Jackson Street #700  
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Graco Minnesota, Inc.

380 Jackson Street #700  
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Hydraflow Equipment Co.

*Attn:* Kenneth A. Taylor  
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Intech Equipment & Supply, LLC

*Attn:* Gary A. Drummond  
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Jack De Mita

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Marco Group International, Inc. (MARCO)

*Attn:* Franklin S. Mitvalsky  
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MCC Equipment & Service Center  
Attn: Linda Graham  
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N.C.F.I. Polyurethanes  
(Div. of Barnhardt Manufacturing Company)  
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Mount Airy, NC 27030

Midway Industrial Supply  
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The Paint Project  
Attn: Robert L. Zaffino  
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Specialty Products, Inc.  
Attn: Dan Helton  
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Spray Foam Nation  
(Registered under Energy Independence Inc.)  
c/o Secretary of the State  
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Spray Foam Systems, Inc.  
Attn: Jennifer Anna Hunter  
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Greensboro, GA 30642

Spray Pump, Inc.  
*Attn:* Willie E. Herrington  
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Spray-Quip, Inc.  
*Attn:* Herbert S. Chilman, Jr.  
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Houston, TX 77023

Ultimate Linings, Ltd.  
*Attn:* Alan N. Magenheim  
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Urethane Supply Company  
(registered Under Signal Ventures Inc.)

*Attn:* Keith R. Lammon  
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Rainsville, AL 35986

s/ Lawrence H. Pockers  
Lawrence H. Pockers

June 19, 2013